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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) CASE NO. 13-CR-93 JST  
)  
) STIPULATION TO EXCLUDE TIME UNDER  
) SPEEDY TRIAL ACT AND ~~PROPOSED~~ ORDER  
v. )  
)  
JONATHAN MOTA )  
)  
Defendant )  
)

The parties appeared before the Honorable Jon S. Tigar on December 9, 2013 for a hearing to set trial dates and pretrial dates. Assistant U.S. Attorneys Kathryn Haun and William Frentzen represented the United States, and Richard B. Mazer, Esq. represented the defendant. The parties moved for an exclusion of time from DECEMBER 9, 2013 to MARCH 7, 2014. The Court found and held as follows:

1. An exclusion of time under the Speedy Trial Act, 18 U.S.C. Section 3161, from DECEMBER 9, 2013 to MARCH 7, 2014, is necessary in light of the need for effective preparation of the case by defendant's counsel. Failure to grant the requested continuance would unreasonably deny defense counsel the time necessary for effective preparation, taking into account the exercise of due diligence

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1 and the need for counsel to conduct further investigation. This is especially true given the government's  
2 ongoing production of discovery.

3 2. Given these circumstances, the Court found that the ends of justice served by excluding the  
4 period from DECEMBER 9, 2013 to MARCH 7, 2014, outweigh the best interest of the public and the  
5 defendant in a speedy trial. 18 U.S.C. Section 3161(h)(7)(A).

6 3. Accordingly, and with the consent of the defendant, the Court ordered that the period from  
7 DECEMBER 9, 2013 to MARCH 7, 2014, is excluded from Speedy Trial Act calculations under 18  
8 U.S.C. Section 3161(h)(7)(A) & (B)(ii) and (iv).

9 IT IS SO ORDERED.

10 DATED: December 11, 2013



JOHN S. TIGAR  
United States District Court Judge

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